

16 plan will be feasible.

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36 :23 Q: Okay. Does LTL have any secured creditors?  
24 A: I do not believe it does.

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37 :5 Q: Okay. As the corporate representative, are you  
6 aware of any secured debt that the debtor needs to  
7 address or resolve within the bankruptcy?  
8 A: I do not. I am not aware of any.  
9 Q: Are you aware of any asset that LTL owns that  
10 is subject to a lien or security interest of any kind?  
11 A: I do not believe that there are any, no.  
12 Q: Okay. Does LTL have any trade creditors?  
13 A: I do not believe it does.

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45 :10 Other than contracts that concern claims  
11 based on talc and intercompany agreements, is LTL party  
12 to any other contract that you're aware of?  
13 A: I am not aware of any.

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45 :15 LTL has no employees, correct?  
16 MS. BROWN: Objection, foundation.  
17 A: LTL's employees that have been seconded to it  
18 from Johnson & Johnson Services, Inc.

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45 :21 Are you aware of any tax claims that have  
22 been asserted against LTL?  
23 A: I am not aware of any claims asserted.  
24 Q: Okay. We talked yesterday -- not we, but other  
25 lawyers and yourself spent some time on the funding  
46 :1 agreement. Do you remember that?  
2 A: I do recall that, yes.  
3 Q: Okay. Does LTL have any reason to believe that  
4 Johnson & Johnson and JJCI will not honor its  
5 obligations under the funding agreement?  
6 A: It has no reason to believe that Johnson &  
7 Johnson and JJCI will not honor the terms of the funding  
8 agreement.  
9 Q: In fact, LTL expects Johnson & Johnson and JJCI  
10 to honor their obligations under the funding agreement,  
11 correct?  
12 A: LTL does and has already undertaken -- gotten  
13 funds from the funding agreement.  
14 Q: Okay. Does LTL have any reason to believe that  
15 Johnson & Johnson or JJCI will be unable to fulfill  
16 their obligations under the funding agreement?